

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

TURTLE ISLAND FOODS SPC d/b/a the
TOFURKY COMPANY and THE GOOD
FOOD INSTITUTE, INC.,

Plaintiffs,

v.

LOCKE THOMPSON, in his official capacity
as Cole County prosecuting attorney and on
behalf of a *defendant* class of all Missouri
prosecuting attorneys; and Chris Chinn, in her
official capacity as the Director of the Missouri
Department of Agriculture,

Defendants,

State of Missouri,

Intervenor-Defendant.

Case No. 2:18-cv-04173 FJG

**JOINT MOTION FOR EXTENSION OF
DISCOVERY AND DISPOSITIVE MOTION DEADLINES**

On December 14, 2022, the Court denied the Missouri Cattlemen's Association's motion to quash Plaintiffs' subpoena and granted in part Plaintiffs' motion to compel discovery from the State. On the same date, the Court then issued the Third Amended Scheduling Order (Doc. No. 139), extending the close of discovery to February 16, 2023. The Third Amended Scheduling Order retained the previous deadline for summary judgment motions, which also falls on February 16, 2023.

Plaintiffs are in the process of obtaining documents from the Missouri Cattlemen's Association (MCA) and have exchanged multiple letters attempting to resolve production disputes. There is one final issue remaining in dispute related to whether MCA must produce

documents retained by current and former board members and officers. If this final issue cannot be resolved between the parties, court intervention may become necessary. Further, the effort to respond to Plaintiff's discovery requests by the State and the Missouri Department of Agriculture has resulted in a high volume of potentially relevant documents. Undersigned counsel for the State and the Missouri Department of Agriculture continues to review these documents and requires additional time to review and produce them to counsel for Plaintiffs.

In order to provide the Court with robust motions for summary judgment that fully incorporate relevant evidence produced in discovery, the parties respectfully ask the Court to extend the deadline for discovery as well as the deadline for dispositive motions. The extensions are requested jointly and would not prejudice either party.

The parties respectfully propose the following modifications to this Court's Third Amended Scheduling Order (Doc. No. 139):

Discovery shall be completed by **March 31, 2023**.

All motions for summary judgment and other motions shall be filed no later than **May 31, 2023**.

Respectfully submitted,

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Certificate of Service

I certify that on February 3, 2023, a copy of the foregoing was electronically filed with the Court using the CM/ECF system, which sent notification to counsel of record.

/s/ Gillian R. Wilcox